

# EXHIBIT A



**Service of Process  
Transmittal**

07/06/2020

CT Log Number 537892693

**TO:** KIM LUNDY SERVICE OF PROCESS  
WALMART INC.  
702 SW 8TH ST  
BENTONVILLE, AR 72716-6209

**RE: Process Served in West Virginia**

**FOR:** Wal-Mart Stores East, LP (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Dawson Karen, Pltf. vs. Wal-Mart Stores East, LP, et al., Dfts.

**DOCUMENT(S) SERVED:** -

**COURT/AGENCY:** None Specified  
Case # 20C506

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Charleston, WV

**DATE AND HOUR OF SERVICE:** By Certified Mail on 07/06/2020 postmarked on 06/30/2020

**JURISDICTION SERVED :** West Virginia

**APPEARANCE OR ANSWER DUE:** None Specified

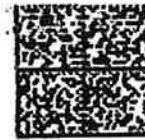
**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 07/06/2020, Expected Purge Date: 07/11/2020  
Image SOP  
Email Notification, KIM LUNDY SERVICE OF PROCESS ctlawsuits@walmartlegal.com

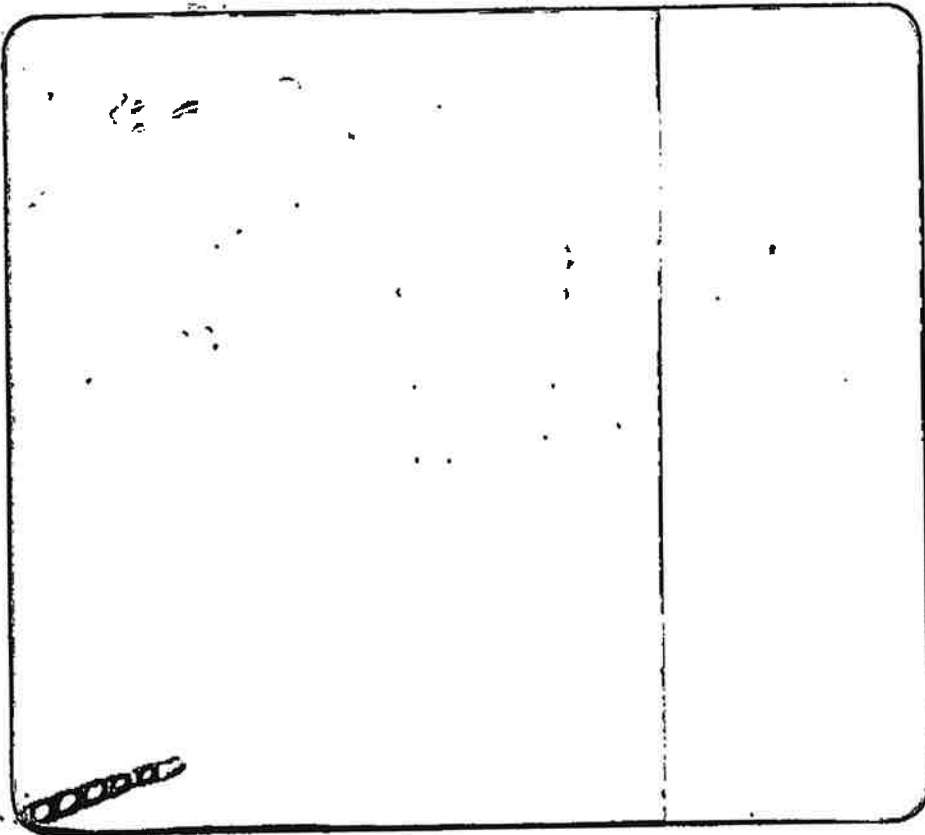
**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

**For Questions:** 877-564-7529  
MajorAccountTeam2@wolterskluwer.com

CERTIFIED MAIL



U.S. POSTAGE PRIME BOWES  
ZIP 25311 \$ 006.45<sup>0</sup>  
02 47  
0000336734/JUN 30, 2020.



Office of the Secretary of State  
Building 1 Suite 157-K  
1900 Kanawha Blvd E.  
Charleston, WV 25305

USPS CERTIFIED MAIL™



9214 8901 1251 3410 0002 7281 65

WAL-MART STORES EAST, LP  
C. T. Corporation System  
1627 QUARRIER ST.  
CHARLESTON, WV 25311



**Mac Warner**  
Secretary of State  
State of West Virginia  
Phone: 304-558-8000  
888-767-8683  
Visit us online:  
[www.wvsos.com](http://www.wvsos.com)

Control Number: 259165

Defendant: WAL-MART STORES EAST, LP  
1627 QUARRIER ST.  
CHARLESTON, WV 25311 US

Agent: C. T. Corporation System

County: Kanawha

Civil Action: 20-C-506

Certified Number: 92148901125134100002728165

Service Date: 6/29/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in your name and on your behalf.

*Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in your name and on your behalf as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.*

Sincerely,

Mac Warner  
Secretary of State

**IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA**

**KAREN DAWSON,**  
**Plaintiff,**

**v.**

**Civil Action No:**  
**Judge:**

**WAL-MART STORES EAST, LP;**  
**WALMART STORE #2036; and**  
**WALMART INC.**  
**Defendant.**

**Summons**

**Notice of Process Address:**

**Wal-Mart Stores East, LP**

**CT Corporation System**

**1627 Quarrier Street**

**Charleston, WV 25311-2124**

ACCEPTED FOR  
SERVICE OF PROCESS  
2020 JUN 29 P 4:44  
CLERK OF STATE  
COURT OF WEST VIRGINIA

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Kevin P. Davis, Attorney at Law, plaintiff's attorney, whose address is P.O. Box 6067, Charleston, WV 25362, an answer, including any related counter-claim the Defendant may have, to the complaint filed against you in the above styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 30 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled civil action.

Dated

6/23/20

**Cathy S. Gatson, Clerk**

**CLERK OF COURT**

*B. P. B.*

**IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA**

**KAREN DAWSON,**

**Plaintiff,**

**v.**

**WAL-MART STORES EAST, LP;**

**WALMART STORE #2036; and**

**WALMART INC.**

**Defendant.**

Civil Action No:

Judge:

**FILED**

2020 JUN 23 AM 9:28

CATHY S. GATSON, CLERK  
KANAWHA COUNTY CIRCUIT COURT

20-C-506

Tobt

**COMPLAINT**

1. The Plaintiff, Karen Dawson, was and is a citizen and resident of Kanawha County, West Virginia.
2. The Wal-mart Stores East, LP is a foreign corporation authorized to do business in West Virginia with a principal office address of 708 SW 8<sup>th</sup> Street, Bentonville, AR, 72716 and Notice of Process address of CT Corporation System, 1627 Quarrier Street, Charleston WV 25311-2124.
3. Walmart Store 2036 is located at 2700 Mountaineer Blvd, South Charleston WV 25309 and upon reasonable inquiry is part of Wal-mart Stores East, LP and/or Walmart Inc.
4. Walmart Inc. is a foreign corporation authorized to do business in West Virginia with a principal office of 708 SW 8<sup>th</sup> Street, Bentonville, AR 72716 and Notice of process address of CT Corporation System, 1627 Quarrier Street, Charleston WV 25311-2124.
5. The Plaintiff was an invitee on the premises of Wal-mart in South Charleston, West Virginia, on June 23, 2018.
6. The Defendants owed a duty of care to the invitees that visited the premises of the business and specifically keeping the floor safe from anything that could cause a customer to fall and get injured.
7. The Plaintiff at all times mentioned in this Complaint acted with reasonable care.
8. On June 23, 2018 while at the Wal-mart in South Charleston, Plaintiff was walking down the automotive aisle and slipped upon unseen liquid on the floor.
9. Plaintiff slipped on the liquid, was caused to fall, and causing serious and permanent injury to her person.
10. The Defendants knew or should have known that the liquid was spilled on the floor and was a slipping hazard to the public.
11. The Defendants owed a duty of care to the invitees that visit their premises in a manner that does not allow hazardous conditions to exist and this spilled liquid on the floor was blatantly a hazard.

12. The Defendants were responsible through the actions and non-actions of its employees, agents, and store manager and had a duty to make sure the premises were safe for the public, especially someone like the plaintiff.
13. At all times relevant herein, Defendants, acted gross reckless and/or wanton in maintaining the floor in a safe condition for its customers.
14. As a proximate result of Defendants negligence, the Plaintiff, Karen Dawson, sustained severe and permanent injuries to her person and was otherwise injured.
15. As a direct and proximate result of the negligence and carelessness of the Defendants, the Plaintiff was injured and has undergone medical treatment; has incurred medical expenses and will continue to incur medical expenses in the future; has endured pain and suffering, both in the past and in the future; has incurred lost wages and will continue to do so in the future; and the Plaintiff has in the past suffered annoyance, aggravation, and mental anguish and will continue to do so in the future.

WHEREFORE, the plaintiff demands judgment against the Defendants, in the amount that will fully and fairly compensate Plaintiff for: (1) special damages for the Defendants negligence; (2) general damages for the Defendants negligence; (3) prejudgment interest on the plaintiff's special damages; (4) punitive damages; (5) costs of this action; and (6) such other and further relief as deemed just and proper by the Court.

PLAINTIFF DEMANDS A JURY TRIAL

Respectfully submitted,

KAREN DAWSON  
*Plaintiff, by counsel,*

---

KEVIN P. DAVIS (WVSB # 8687)  
P.O. BOX 6067  
Charleston, West Virginia 25362  
(304) 380-9080 (office)  
(304) 989-0610 (cell)



**Service of Process  
Transmittal**

07/06/2020

CT Log Number 537892668

**TO:** KIM LUNDY SERVICE OF PROCESS  
WALMART INC.  
702 SW 8TH ST  
BENTONVILLE, AR 72716-6209

**RE:** Process Served in West Virginia

**FOR:** WALMART INC. (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Dawson Karen, Pltf. vs. Wal-Mart Stores East, LP, et al., Dfts. // To: Walmart Inc  
*Name discrepancy noted.*

**DOCUMENT(S) SERVED:** -

**COURT/AGENCY:** None Specified  
Case # 20C506

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Charleston, WV

**DATE AND HOUR OF SERVICE:** By Certified Mail on 07/06/2020 postmarked: "Illegible"

**JURISDICTION SERVED :** West Virginia

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

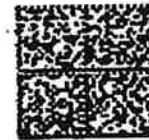
**ACTION ITEMS:** CT has retained the current log, Retain Date: 07/06/2020, Expected Purge Date:  
07/11/2020  
  
Image SOP  
  
Email Notification, KIM LUNDY SERVICE OF PROCESS ctlawsuits@walmartlegal.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

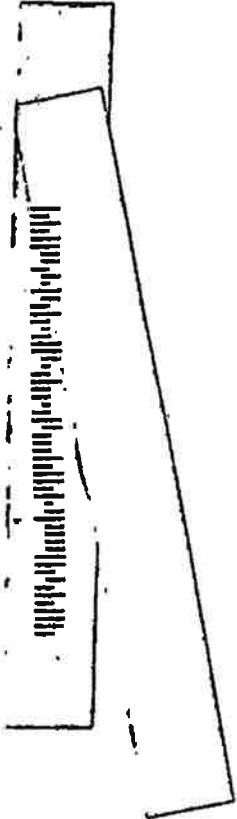
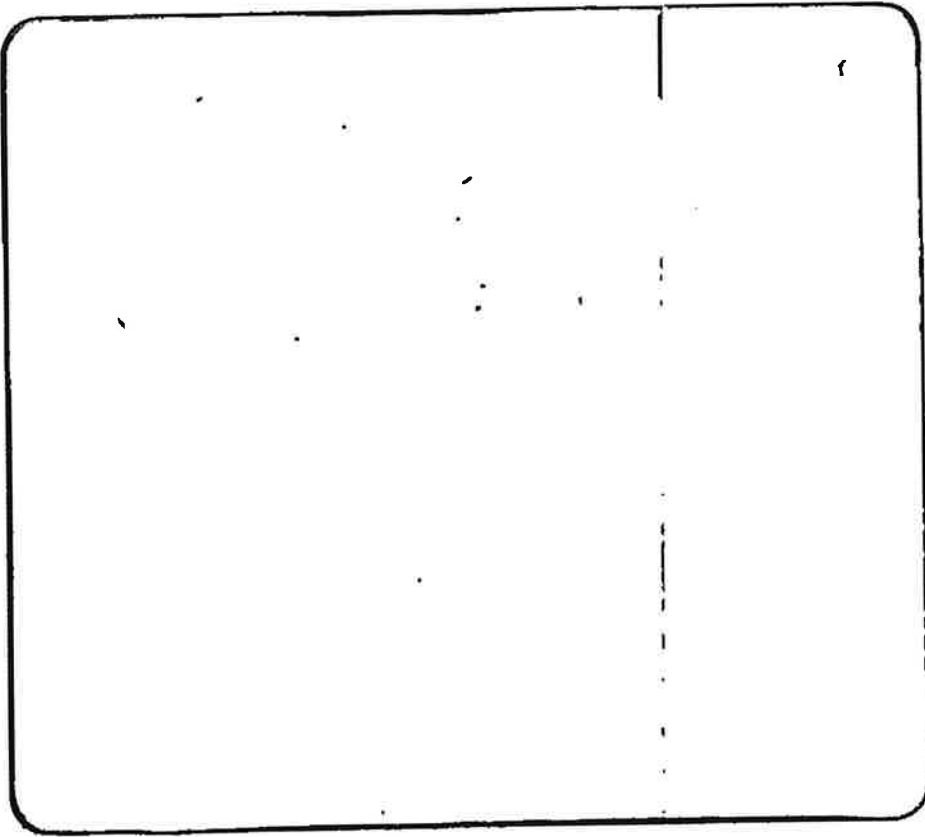
**For Questions:** 877-564-7529  
MajorAccountTeam2@wolterskluwer.com



CERTIFIED MAIL



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0000336734 JUN 30 2020



Office of the Secretary of State  
Building 1 Suite 157-K  
1900 Kanawha Blvd E.  
Charleston, WV 25305



**Mac Warner**  
Secretary of State  
State of West Virginia  
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[www.wvsos.com](http://www.wvsos.com)

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9214 8901 1251 3410 0002 7281 58

WALMART INC  
C. T. Corporation System  
1627 QUARRIER ST.  
CHARLESTON, WV 25311

Control Number: 259164

Defendant: WALMART INC  
1627 QUARRIER ST.  
CHARLESTON, WV 25311 US

Agent: C. T. Corporation System

County: Kanawha

Civil Action: 20-C-506

Certified Number: 92148901125134100002728158

Service Date: 6/29/2020

I am enclosing:

**1 summons and complaint**

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your corporation.

*Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.*

Sincerely,

A handwritten signature in black ink that reads "Mac Warner".

Mac Warner  
Secretary of State

**IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA**

**KAREN DAWSON,**  
**Plaintiff,**

**v.**

**WAL-MART STORES EAST, LP;**  
**WALMART STORE #2036; and**  
**WALMART INC.**  
**Defendant.**

Civil Action No: **20-c-506**  
Judge: **Tabb**

**Summons**

Notice of Process Address:

Walmart Inc.

CT Corporation System

1627 Quarrier Street

Charleston, WV 25311-2124

ACCEPTED FOR  
SERVICE OF PROCESS  
2020 JUN 29 P 4:44  
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COURT OF WEST VIRGINIA

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Kevin P. Davis, Attorney at Law, plaintiff's attorney, whose address is P.O. Box 6067, Charleston, WV 25362, an answer, including any related counter-claim the Defendant may have, to the complaint filed against you in the above-styled civil action, a true copy of which is herewith delivered to you. You are required to serve your answer within 30 days after service of this Summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint and you will be thereafter barred for asserting in another action any claim you may have which must be asserted by counterclaim in the above styled civil action.

Dated: 6/23/20

**Cathy S. Gatson, Clerk**

CLERK OF COURT

**BLAB**

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Civil Action No:

Judge:

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WALMART INC.

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**PLAINTIFF DEMANDS A JURY TRIAL.**

Respectfully submitted,

**KAREN DAWSON**  
*Plaintiff, by counsel,*



---

**KEVIN P. DAVIS (WVSB # 8687)**  
P.O. BOX 6067  
Charleston, West Virginia 25362  
(304) 380-9080 (office)  
(304) 389-0610 (cell)